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# Group Charter of Commitments on Human Rights

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## 1 Subject

In line with the Group's Code of Ethics, this document defines the commitment and guidelines of the Iccrea Cooperative Banking Group (hereinafter also referred to as 'the Group') to promote and guarantee the protection of human rights, in compliance with national and international regulations.

## 2 General Principles

In addition to ensuring full and substantial compliance with human rights legislation, the Iccrea Cooperative Banking Group is guided by the principles issued by leading national and international organisations, including:

- The United Nations (UN) International Bill of Human Rights;
- The Universal Declaration of Human Rights and subsequent international conventions on Civil and Political Rights and on Economic, Social and Cultural Rights;
- United Nations conventions on women's rights, the elimination of all forms of racial discrimination, children's rights, and the rights of persons with disabilities;
- The 2030 Agenda for Sustainable Development and its 17 Sustainable Development Goals (SDGs);
- The fundamental conventions of the International Labour Organisation (ILO) - Nos. 29, 87, 98, 100, 105, 107, 111, 138, 169, 182 - and the Declaration on Fundamental Principles and Rights at Work; The UN Convention on the Rights of the Child and the European Convention on Human Rights;
- The 10 principles of the UN Global Compact;
- The Guiding Principles on Business and Human Rights: implementing the UN framework 'protect, respect and remedy';
- Guidelines of the Organisation for Economic Co-operation and Development (OECD) for Multinational Enterprises;
- Equator Principles;
- Third Sector Code (Legislative Decree No. 117 of 3 July 2017).

## 3 The Iccrea Cooperative Banking Group's commitment to human rights

The Cooperative Banking Group, through this document, outlines its commitment to human rights in order to prevent and manage any adverse impacts directly or indirectly related to its operations. This commitment is supported by its strong correlation with cooperation and

mutualism. In fact, the Group actively promotes the values contained in the Charter of Values of Cooperative Credit, 'inspiring its activities with attention to and promotion of the individual', with particular emphasis on the value of each individual and the importance of investing 'in human capital – consisting of members, customers and employees – in order to enhance its value in the long term'<sup>1</sup>.

The Group is aware of its influence in its context and promotes respect for human rights and freedoms - as defined in the Universal Declaration of Human Rights - operating responsibly in order to create value for the benefit of all stakeholders (i.e. employees, collaborators, customers, members, suppliers, communities and the local area) while respecting their rights, contributing to the development of the local areas and the well-being of the communities in which it operates.

As highlighted in the Cohesion Agreement, the Group is committed to maintaining and monitoring the mutualistic aspects of its affiliated BCCs. **Mutualism**, a fundamental part of the BCCs' identity, interprets the interconnection between the "social" and "environmental" factors, representing the key to understand local "sustainability". The financial well-being of the BCCs is closely linked to the social, economic and environmental well-being of the areas in which they operate. Ninety-five per cent of the BCCs' deposits remain in the local area, feeding back into the local economy in a circular manner. For this reason, the BCCs are the entities in the banking industry that most actively apply ESG factors in their daily operations. It is therefore a '**moral and corporate**' obligation for the Group to develop concrete responses to both social and environmental change.

The Group is therefore committed to preventing any negative impact on human rights directly related to its operations and activities or indirectly related to them by virtue of its products and services or its commercial relationships.

In order to contribute to greater awareness and protection of human rights, the Group is committed to promoting the internal and external dissemination of the values and principles underlying sustainable development. With a view to continuous improvement, the Group is committed to raising internal awareness of the importance of integrating ESG (Environmental, Social and Governance) criteria, including human rights, and to promoting transparency towards stakeholders regarding how ESG factors are managed.

Inspired by the highest international principles, the Group's commitment takes the form of a virtuous path outlined by a sustainability strategy that includes a responsible commitment to issues related to the protection of human rights.

## 4 Measures to protect human rights

The general principles that guide the Group in managing its impact on human rights and effectively integrating aspects relating to the protection of these rights into its business strategies and operations are embodied in specific measures aimed at protecting all of the

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<sup>1</sup> Article 1 of the Charter of Values of Cooperative Credit.



Group's stakeholders: employees and collaborators, partners and customers, suppliers, communities and the local area.

To protect human rights, the Group is committed to the following undertakings, which apply to all its stakeholders:

- **Non-discrimination:** the Group is committed to combating all forms of discrimination based on gender, age, ethnicity, religion, political and trade union affiliation, sexual orientation and gender identity, language or disability (equal opportunities in recruitment, management, development and professional growth of staff).
- **Health and safety in the workplace:** for the Group, ensuring a safe and healthy workplace is a fundamental part of responsible personnel management. To this end, the Group is inspired by the highest health and safety standards, with the aim of preventing or managing any risks that may have consequences for employees and collaborators, partners and customers.
- **Good working conditions:** the Group is committed to ensuring fair remuneration in line with the minimum wage requirements set out in national collective agreements, equal opportunities for both sexes and employment support for people with disabilities, as well as promoting a good work-life balance. The Group is opposed to all forms of harassment or violence in the workplace and to working conditions that may cause discomfort and stress.
- **Freedom of association and collective bargaining:** the Group respects the right to freedom of association and collective bargaining, contesting all forms of discrimination against those involved in representing workers.
- **Abolition of child and forced labour:** the Group does not use child or forced labour and is committed to combating this practice in all its forms.
- **Protection of personal data:** the Group is committed to protecting the data and information of members and customers and their right to privacy, as required by current legislation.

#### 4.1 Protection of human rights with regard to employees, collaborators, partners, customers and suppliers

**Employees and collaborators:** the Group is committed to respecting the person and dignity of each employee and collaborator. The Group is aware of the importance for a business to respect and protect the human rights of its employees. Specifically, in the conduct of its business, the Group prohibits discrimination, forced labour and child labour, and is committed to ensuring good working conditions, health and safety, as well as the right to freedom of association and union membership. The Group is committed to providing its employees with qualified training, ensuring the confidentiality and protection of personal data, guaranteeing safe working conditions and establishing working hours that promote well-being and productivity, in line with local and international regulations.

**Members and customers:** for the Group, operating in the financial sector means not only supporting the national economy, but also playing a leading role in the responsible and sustainable growth of the country. In order to meet the demands and expectations of all its members and customers, the Group operates on a daily basis, inspired by the corporate

values included in the Cooperative Credit Charter of Values and respect for human rights, and taking primary care of the data and information of its members and customers.

The Group is aware that it plays an important role in the real economy and that its operations and interactions with external stakeholders can also have indirect impacts in the area of human rights. Therefore, the Group is committed to spreading the values it applies internally in this area to its customers as well, developing and promoting a range of specific products and services that can generate positive social impacts, while respecting human rights.

**Suppliers:** the Group is committed to promoting sustainable behaviour throughout its supply chain by complying with applicable laws and regulations in the management of its suppliers, as well as with the provisions of the Codes of Ethics of the companies and banks belonging to the Group. Therefore, as with its customers, the Group is committed to promoting the values it applies internally in the area of human rights among its suppliers.

Similarly, the Group undertakes to require specific behavioural guarantees from its suppliers:

- protection of workers: the Bank requires its suppliers to operate in compliance with all applicable laws and regulations, and with the rules and standards of their respective sectors of activity;
- non-discrimination for gender, age, ethnicity, religion, political and trade union affiliation, sexual orientation and gender identity, language or disability;
- right to health and safety (avoiding business relationships with suppliers involved in violations of relevant regulations);
- combating forms of child and forced labour (avoiding business relationships with suppliers involved in violations of this principle);
- traceability, transparency and impartiality: suppliers are selected through clear, transparent, certain and non-discriminatory procedures.

## 4.2 Protection of community rights and support for the local area

**Community and territory:** in promoting the mission established in Art. 2 of the BCC Statute, the Group, through the widespread presence of its affiliates throughout the country, has established strong ties with the relevant communities with the aim of actively contributing to the responsible and sustainable development of its geographical areas of reference, including through listening to and dialogue with local stakeholders, including the Third Sector. The Group recognises the need to take all necessary measures to identify and manage any direct or indirect impact on the communities in which Iccrea and the BCCs operate, always taking into account the principles of mutuality, inclusiveness, social sustainability, shared value and solidarity, in particular:

- **Mutuality:** in line with the governance of its affiliated banks, based on shareholder participation and a widely owned business model, the Group promotes a multi-stakeholder approach in the local communities of which the BCCs are a direct expression.
- **Inclusiveness of services offered:** the Group is committed to offering products and services that are accessible to different types of customers, without discrimination.

- **Social sustainability:** in line with the principles of sustainability and horizontal subsidiarity, the Group constantly collaborates with local authorities, the third sector and local communities to listen to and address the social needs arising from situations of fragility and disadvantage, including those linked to natural disasters, making its corporate volunteer network, economic tools, technologies and resources available to the community to help overcome these situations quickly.

- **Shared value:** through relationships and collaborations with local institutions and communities and by listening to its members, particularly young members where they are present and organised in committees, the Group creates shared economic and social value for the communities it serves.

In order to contribute to the creation of fair and sustainable shared value, the Group is committed to spreading a culture of sustainability in the areas in which it operates and to promoting dedicated services and products aimed at having a positive social impact.

- **Solidarity:** the Group is committed to promoting solidarity actions and sponsorships for projects and initiatives that respond to the social needs of communities, support population groups at risk of marginalisation, ensure fair and inclusive growth in the territories, promote respect for human rights and environmental protection, support social and technological innovation at the service of humankind.

## 5 Monitoring and reporting to stakeholders

The Group ensures effective and efficient management of human rights impacts through:

- continuously monitoring human rights impacts and risks – considering the Group's operations and activities, the external context, international changes (e.g. legislative developments, principles and standards), as well as the results of stakeholder engagement activities – thanks to the contribution of all functions that assess the Group's impacts and risks, including those associated with human rights, as part of their daily activities;

- raising awareness among all company structures to participate, including through the commitment of each manager, in the continuous improvement of their operating context and the surrounding environment, promoting increasingly sustainable actions in terms of human rights protection.

Performance in managing the Group's impact on human rights is reported in public company documents intended for the Group's stakeholders, in particular in sustainability reporting, which requires the involvement of all stakeholders with whom the Group interacts.

This involvement is useful for assessing the results achieved and identifying new objectives and priorities for action, as well as for identifying any new relevant issues, with the aim of raising awareness among stakeholders and increasing management involvement in pursuing the objectives of the human rights protection policy.

Based on the results of the monitoring activity, the Group undertakes to update this Policy in line with changes arising from external or internal factors.